

EXHIBIT D

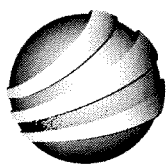
TO THE DECLARATION OF CLAUDE D. MONTGOMERY, ESQ.

In the Matter Of:
CITY OF DETROIT, MICHIGAN

Case No. 13-53846

LAMONT SATCHEL

September 19, 2013



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1 A. Yes.

2 Q. I didn't mean to.

3 A. I was not aware of that.

4 Q. And as regards pension benefits, which is what we've
5 been looking at, do you know whether the plan, the
6 proposal that was presented by the City on September
7 11 changed in any way from what it presented first on
8 June 14th and then again on June 20th?

9 A. I haven't -- I'm not aware of nor have I seen a
10 proposal that the City made on September 11.

11 Q. So you don't know one way or the another?

12 A. I don't.

13 Q. Okay, fair enough.

14 Now, is it -- to your knowledge can someone
15 or a retiree, for example, look at the information
16 that's contained in S18 and be able to figure out
17 monetarily what the total impact of this proposal is
18 on that particular individual?

19 A. I don't know.

20 Q. Okay. And you think that's something that someone
21 would want to be able to understand in order to
22 analyze a proposal that's being made and respond
23 intelligently to it?

24 MR. MILLER: Object to form. Calls for
25 speculation.



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1 A. Could you rephrase that?

2 MR. ULLMAN: Can you repeat it?

3 (Record read back as requested.)

4 A. What's the that?

5 Q. Being able to understand the monetary impact to the
6 affected individual of what is being proposed. If I
7 were presenting you with a proposal, you would want to
8 understand how -- a proposal that purports to affect
9 how much money you're going to get, how many benefits
10 you're going to receive, you would want to know what
11 the monetary impact on you is overall in order to
12 think about it, understand it and respond to; true?

13 A. If it had a monetary impact and --

14 MR. MILLER: Let me interpose an objection.
15 Object to form.

16 Q. You can answer the question.

17 A. If it had a monetary impact and I had an interest in
18 that regard, I would. If I didn't, I wouldn't.

19 Q. Okay. Now, we talked about the June 20 meeting. What
20 I'm going to do is show you two documents. I'm going
21 to have them marked serially, but I'm going to show
22 them to you at the same time and then ask you about
23 them because they're related; okay?

24 A. All right.

25 MR. ULLMAN: So we're going to mark these



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1 State of Michigan)

2 County of Genesee)

3 Certificate of Notary Public

4 I certify that this transcript is a complete, true and
5 correct record of the testimony of the witness held in this
6 case.

7 I also certify that prior to taking this deposition,
8 the witness was duly sworn or affirmed to tell the truth.

9 I further certify that I am not a relative or an
10 employee of or an attorney for a party; and that I am not
11 financially interested, directly or indirectly, in the
12 matter.

13 WITNESS my hand this 20th day of September,
14 2013.

15

16

17



18

Jeanette M. Fallon, CRR/RMR/CLR/CSR-3267

19

Certified Realtime Reporter

20

Registered Merit Reporter

21

Certified LiveNote Reporter

22

Certified Shorthand Reporter

23

Notary Public, Genesee, Michigan

24

Acting in Oakland County, Michigan

25

My Commission Expires: 9-19-18



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